

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRIAN KEMP, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**Exhibit A  
Plaintiffs' Joint Proposed Schedule**

<b>Case Event</b>	<b>Date</b>
Status Conference	by September 28, 2018
Fact Discovery Opens*	by September 28, 2018
Answers to SAC and TAC Due	Within 3 calendar days of status conference (but no later than October 2, 2018)
Close of Fact Discovery	December 21, 2018
Simultaneous Expert Reports	December 21, 2018
Expert Reply Report(s)	January 11, 2019
Close of Expert Discovery	January 25, 2019
Trial Readiness	February 2019

\*All responses to discovery requests, including production of documents or data in response to requests pursuant to Fed. R. Civ. P. 34, shall be due within 14 calendar days of receipt of any such request. Service of discovery requests and responses may be effected by email on counsel of record for all parties.